

Chris Lewicki, KC7NYV
2702 E. 7th St.
Tucson, AZ 85716-4706

DOCKET FILE COPY ORIGINAL

May 17, 1998

Re: RM 9267
Secretary
Federal Communications Commission
Washington DC, 20554

Dear Sir or Madam:

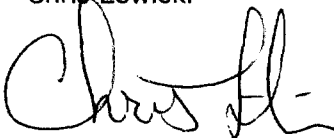
I'm writing to express my opposition to the reallocation of the amateur radio 70cm band for use by the Land Mobile Communications Council. I use the 420 to 430 and 440 to 450 MHz frequency bands on a daily basis for amateur communications, as well as for communications with orbiting amateur satellites, including a satellite which the University of Arizona is currently developing for launch in the next few years.

Although there is a proliferation of newly emerging commercial radio telecommunications services, these services can find usable frequencies outside of the amateur radio bands. The amateur radio bands always have been and continue to be a valuable asset to communities everywhere, and "selling them out" won't gain anything in the long run.

I hope this recent request by LMCC will be quickly refused. Thank you.

Sincerely,

Chris Lewicki



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Attn: RM9267

Secretary
FCC
Washington DC, 20554

May 13, 1998

Randall G. Light Sr. KA3DSX
14 Sunrise Dr.
Hamburg, Pa. 19526-9760

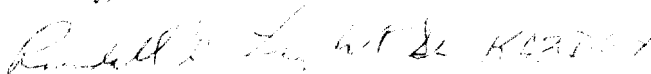
I have recently become aware of a request by the Land Mobile Communications Council to reallocate various frequencies for their profit making ventures. Some of these frequencies are in use by various non-profit and public service organizations. I am writing to voice my concerns about their request.

Specifically, I am extremely concerned about the 420-450 MHz band. As you are aware, this band is in use throughout the United States by FCC licensed Amateur Radio Operators. This band is extremely popular in the United States and represents a vital portion of the Amateur Radio community's spectrum. It is utilized for various Public Service purposes, including organized emergency communications during earthquakes, storms, floods and other natural disasters, as well as personal communications.

Amateur radio operators rely on this band to assist various government agencies with their efforts, and have invested millions of dollars of personal funds in equipment for this band. Any change to this band will negatively impact our ability to provide public service and could render our financial and personal investments worthless.

I strongly oppose any changes as requested by the Land Mobile Communications Council and ask that their profit-oriented request be denied.

Sincerely,



Randall G. Light Sr.
Treasurer, Dauberville DX Association

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List A B C D E

202 Twin Oaks Drive
West Monroe, LA 71291
May 18, 1998

Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Sir:

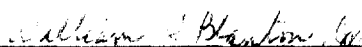
This letter is in opposition to RM-9267 which would assign the 440 MHz amateur radio band to either secondary service for amateurs or the loss of the band in its entirety. Amateurs have long since been most beneficial to the public in times of emergency and other public service endeavors. We have invested millions of dollars in equipment at no cost to the taxpayers of our country and the 440 MHz band is one of the most important bands to us if we are to continue serving in times of need.

There is a bill in Congress that will, if passed, mandate that the FCC preserve spectrum space for amateur radio. This says that our representatives realize the need for amateur radio and recognize the service afforded in weather spotting and civil emergencies.

I personally have been involved in several such emergencies, once for a ten day period during a local flood where I spent more than twenty four hours without relief on several occasions. Fifty seven amateurs provided communications between the public servants, (police, fire, highway, National Guard, etc.) around the clock at no cost to these services or to the general public.

Please consider carefully this proposed rulemaking and save the 440 band for the amateur.

Respectfully,


William H. Blanton, Jr.
K5WGQ

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List A B C D E _____

Town: Bedford, Texas
May 18, 1998

DOCKET FILE COPY ORIGINAL
Ref: RM 9267

Secretary, FCC
Washington, DC 20554

Dear Sir,

As I look at the vast "Radio Spectrum" I only see very small dots designated for Amateur Radio use. Surely, this minimal group of frequencies cannot mean that much to any organization other than the public citizens of America. Amateur Radio has been the largest group of volunteers to pioneer the use of this radio spectrum, not only in technical development, but also in training a "ready group" of semi-professional operators.

The (450mhz) 70cm band of Amateur Radio is the second most popular band of frequencies, saturated with simplex and repeater connections, linking the Gulf Coast of Texas to/thru Austin to the Dallas/Fort Worth Metroplex and on to West Texas. Any tampering with the allocations of these frequencies will certainly jeopardize the Public Service that can and has been rendered in time of Gulf Coast Hurricanes and local 'weather watches' in conjunction with the National Weather Service for the Tornado Warning System.

Any one replacing the use of these frequencies must be responsible for a complete reimbursement to each Amateur Radio Operator for his/her replacement of equipment for other frequencies, and assume the responsibility to organize a complete Weather Warning System as it is now organized by Amateur Radio.

I would like to go on record as being bitterly opposed to any tampering with these frequencies now and any time in the future.

Name: MERLE F. RIEL
Call: WB5POV
Address: 861 PATTI DR
Town, State, and zip BEDFORD, TX 76095

I am a member of the Hurst Amateur Radio Club, who operates the Radio Amateur Civil Emergency Service in conjunction with the City of Hurst and Tarrant County.

Signed: Merle F. Riel

c: Senator Kay Bailey Hutchison, 284 Russell Sen. Off. Bldg. Washington, DC 20510-4304	Congresswoman Kay Granger, 100 E. 15 th St. Suite 500 Ft. Worth, TX 761002
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List A B C D E

Town: BEDFORD, Texas
May 18, 1998

Ref: RM 9267

Secretary, FCC
Washington, DC 20554

Dear Sir,

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Any one replacing the use of these frequencies must be responsible for a complete reimbursement to each Amateur Radio Operator for his/her replacement of equipment for other frequencies, and assume the responsibility to organize a complete Weather Warning System as it is now organized by Amateur Radio.

I would like to go on record as being bitterly opposed to any tampering with these frequencies now and any time in the future.

Name: HAROLD J. RIEL
Call: W4SVHT
Address: 861 PATTI DR
Town, State, and zip BEDFORD, TX 76095

I am a member of the Hurst Amateur Radio Club, who operates the Radio Amateur Civil Emergency Service in conjunction with the City of Hurst and Tarrant County.

Signed: Harold J. Riel

c: Senator Kay Bailey Hutchison,	Congresswoman Kay Granger,
284 Russell Sen. Off. Bldg.	100 E. 15 th St. Suite 500
Washington, DC 20510-4304	Ft. Worth, TX 761002

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List A B C D E

Bruce Kromer KB7WIQ
5210 S.E. 118th
Portland, Oregon 97266

Secretary
Federal Communications Commission
Washington DC, 20554

Dear Sir,

This matter is in regards to RM 9267 and it's effects in the Portland, Oregon area. I am concerned that the LMCC requested reallocation of the 70cm band from Amateur Radio use. The 420-450 MHz amateur band in this area has several repeaters that are used to maintain communications in the community for emergency communications. These are set up to allow hospitals to connect to one another in an emergency and pass on status and needs between them. This is important in this area being predictions put the Portland area in a high earth quake area in next 10 years. Present systems in Portland can not with stand this and maintain emergency communications. This has been seen at present with the 911 trunking system going down at random. Cellular services are nice when they are not over loaded. As you know when events like earthquakes happen first thing every one will do is call on the cell phone resulting in this form of communication not working for weeks to months.

Many of our control links are on this band as well. The back bone for our packet system into the state EOC (emergency office coordinator). Our well known Evergreen Intertie allowing connections between all over Oregon, Washington, Idaho, and Montana. In an emergency this would allow us to communicate with other areas of the west getting messages out for help.

Many of the 144-148 MHz repeaters have cross band links which allow use of cross band emergency repeaters. This will allows site specific hand helds to be used to connect into main 2 meter band repeaters.

In this area there is also some experimental modes that are using this too. Amateur Television, as well as slow scan television, and when approved there are several of us waiting to use faster modes of digital like spread spectrum. There are several of us wanting to set up faster larger networking wireless systems allowing digital pictures, voice, and data on the system with multiple users at the same time.

As you can see the loss of this band on a primary basis would effect the entire area now and in the next generation of communications needs. It could in an emergency bring the area to a stand still, resulting in loss of aid and death due to lack of resources to aid in this area.

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May 15, 1998

Secretary, Federal Communications Commission
1919 M. Street NW
Washington, DC 20544

RE: RM 9267

Dear sir,

My amateur radio call sign is KE6QBS and I am writing to urge you to reject the demand for reallocation of the 70 centimeter spectrum to private commercial use.

While no amateur likes to lose any of the spectrum currently available to us we have a particular reason for objecting to this commercial demand. Many of us are members of volunteer organizations and regularly respond to requests for communication assistance in time of local or national disasters. This particular spectrum does not interfere with instrumentation used in hospitals and has been chosen for communications to and from hospitals for this reason at the medical community's request.

Another concern is: Amateur radio is volunteer, "hams" have proven their dedication to the hobby by studying hard to obtain their call, they are a dedicated group who follow the rules and regulations of the service. We volunteer when needed, we are not commercially motivated, It would be a shame once again if our government should decide that commercial interest should take precedence. The almighty buck is the driving factor for our government.

I respectfully request that you deny the request for RM 9267

Sincerely,

Jerry J. Hagan

KE6QBS

To: Secretary
FCC
Washington, DC. 20554

From: Robbie Barker, KQ4RX
653 Kentuck Church Rd.
Ringgold, Va. 24586

Greetings,

This is to inform you as to my opposition to RM-9267. Please don't take away the 440 MHZ band from Amateur Radio. We are also suffering from over crowded conditions. The 2 Meter Band is full now of repeater and digital communications. We need the room on the 440 Band for expansion. We use these frequencies for emergency communications, repeaters, and digital. So please say "No" to RM-9267.....Thank you for your time.

Respectfully yours,

Robbie Barker

Robbie Barker, KQ4RX

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List A B C D E

To: Secretary
FCC
Washington, DC. 20554

From: Ashley R. Barker, KE4KYN
653 Kentuck Church Rd.
Ringgold, Va. 24586

Greetings,

This is to inform you as to my opposition to RM-9267. Please don't take away the 440 MHZ band from Amateur Radio. We are also suffering from over crowded conditions. The 2 Meter Band is full now of repeater and digital communications. We need the room on the 440 Band for expansion. We use these frequencies for emergency communications, repeaters, and digital. So please say "No" to RM-9267....Thank you for your time.

Respectfully yours,

Ashley R. Barker

Ashley R. Barker, KE4KYN

1831 North Donna Drive
Stevensville, Michigan
49127

May 16, 1998

In the Matter of The LMCC's proposal
to REALLOCATE THE 70-CM BAND TO PMRS RM-9267


To: The Chief, Private Wireless Division
Wireless Telecommunications Bureau

OBJECTION TO
REALLOCATION OF PRIMARY 70-CM STATUS TO PMRS

I am writing this letter to express my opposition to the Land Mobile Communications Council's (LMCC) request that primary user status of the 70-cm band be reallocated from the federal government to the Private Mobile Radio Service (PMRS).

As an amateur radio operator, I enjoy the use of the 70-cm band as a secondary user, and I would like this to remain this way. I do not feel that amateur radio operators should share the frequencies described in the LMCC's request, RM-9267, with the PMRS. Therefore, I would encourage the LMCC to seek another alternative, in other frequency ranges.

Thank you,


Walter L. McTague, N8KYC

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List A B C D E

Emery McClendon
6116 Graymoor lane
Fort Wayne, In 46835-2313

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May 17, 1998

To Whom It May Concern:

This letter is being submitted in regards to Ref. Rm9267 request of LMCC to take away the 420 - 450 mhz amateur radio bands for comercial use. As an amateur I feel that this is a big mistake as this allocation is a very popular band for usage among amateur radio operators. I urge you to deny this request, and allow this band plan to remain within the Amateur Radio operators band plan.

Thank you so much for your consideration of this request. Olease deny the request of Ref. Rm9267.

Very truly yours,

Emery W McClendon

Emery McClendon

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Attn: RM9267

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Secretary

FCC

Washington DC, 20554

RECEIVED
MAY 21 1938
FCC MAIL ROOM

I have recently become aware of a request by the Land Mobile Communications Council to reallocate various frequencies for their profit making ventures. Some of these frequencies are in use by various non-profit and public service organizations. I am writing to voice my concerns about their request.

Specifically, I am extremely concerned about the 420 - 450 MHz band. As you are aware, this band is in use throughout the United States by FCC licensed Amateur Radio Operators. This band is extremely popular in the United States and represents a vital portion of the Amateur Radio community's spectrum. It is utilized for various Public Service purposes, including organized emergency communications during earthquakes, storms, floods and other natural disasters, as well as personal communications.

Amateur radio operators rely on this band to assist various government agencies with their efforts, and have invested millions of dollars of personal funds in equipment for this band. Any change to this band will negatively impact our ability to provide public service and could render our financial and personal investments worthless.

I strongly oppose any changes as requested by the Land Mobile Communications Council and ask that their profit-oriented request be denied.

Sincerely,

Your Name, Call HERE

Edward B Russell W3ZHW

EDWARD B RUSSELL

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RECEIVED
MAY 21 1992

FROM:

Name, Callsign: *GEORGE W. SPRINGER*

Address:

City, St, Zip

1820 19TH

WOODWARD, OK. 73801

FCC MAIL ROOM
KMS/HBOL

Secretary, FCC,
Washington DC, 20554

Subject: RM 9267

I protest RM 9267 to reallocate the frequencies that we use in storm spotting for the National Weather Service here in Oklahoma. This would mean that direct link for Storm Spotting would be lost between our Spotters and the National Weather Service. This would effect the early warning abilities for Tornados and Severe Weather as it moves through our communities and Towns.

Comments:

Here in the State of Oklahoma we use many repeaters linked from the 2 Meters to 440 MHZ to help with storm spotting. This would be impossible, to hold this link system without the ability to work the two bands together. The National Weather Service in Norman Oklahoma, some 160 miles from us, is the warning system for Severe Weather which comes through so often here in the State of Oklahoma. Here in Northwest Oklahoma is only one of the several links that is linked to Norman in the State to watch Severe Weather.

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0

Dillion Leon Parks Jr.

Box 36
Reydon, Oklahoma 73660

DOCKET FILE COPY ORIGINAL

WD5KCD

655-4673

COMMUNICATION ENGINEERING • OIL & GAS LEASES • FARM • LOCKSMITH

13 May 1998

RECEIVED
MAY 21 1998
FCC MAIL ROOM

Sec. of the FCC

Washington, D. C. 20544

Gentlemen:

This is to let you know that I am not pleased at what you
are doing with the private radio in the 440 Band under
RM9267.

As a Broadcast Engineer and Ham operator I would
appreciate you keeping these bands for us hams.

Thank you for your time.

Yours Truly,

Dillion L. Parks, Jr.

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List A B C D E

0

FCC MAIL ROOM

MAY 21 1998

RECEIVED

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)
)
An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267
)

To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am a brand new amateur radio operator having received by license in the last 60 days. I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile

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FCC MAIL ROOM

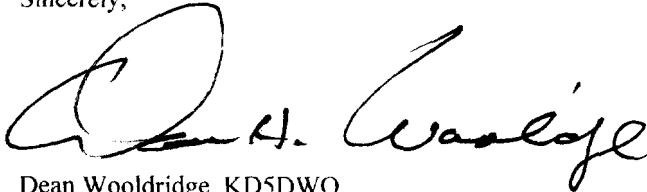
MAY 21 1998

services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,



Dean Wooldridge, KD5DWO

9228 Windy Crest

Dallas, TX 75243

May 18, 1998

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)
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An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267
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To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile

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services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band:

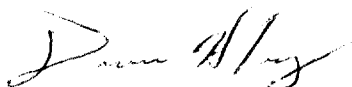
FEMA, RACES, ARES

- ***** Insert your list of supported agencies here *****

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,



Dennis H. Tracey
NONKN
1039 Dulaney Mill Drive
Frederick, MD 21702

May 17, 1998

May 19, 1998

Office of the Secretary,
Federal Communications Commission,
Room 222,
1919 M Street NW,
Washington, DC 20554

COMMENTS OPPOSING RM-9267

Dear Commissioners,

I am writing to oppose the petition by the Land Mobile Communications Council to reallocate a significant portion of the 420-450 MHz Amateur Radio Service band to the Private Mobile Radio Service.

I have been a licensed Amateur since 1991, and during most of my Amateur career, I have concentrated on the VHF/UHF aspect of the service. I am a daily user of the UHF spectrum.

In its petition, the LMCC pleads the case that the Private Mobile Radio Service is a valuable radio service, but that it is overshadowed by larger, more visible radio services. This lack of prominence has put them at a disadvantage in the competition for scarce spectrum resources, they say.

The Amateur Radio Service could make the same claim, but without the long list of large companies and resources behind it mentioned throughout the LMCC petition. We have no powerful, well-financed lobby to protect our interests.

No doubt, PMRS users and LMCC members could use additional spectrum. But should it come at the expense of Amateur Radio? While PMRS is the communications service of large and small business, Amateur Radio is the communications service of the ordinary citizen, the only serious communications outlet for non-commercial radio operation.

The 420-430 and 440-450 MHz UHF bands are essential resources for us. Our 144-148 MHz VHF allocation is overcrowded. Even here, in relatively rural North Carolina, there is no space on that band for additional repeaters near the metropolitan areas. For years, we have been turning to the 440-450 MHz spectrum for expansion. In the larger metropolitan areas of the country, that UHF spectrum is full. Meanwhile, the 420-430 MHz band carries our only non-microwave television spectrum, along with significant linking and control frequencies used in conjunction with analog and digital systems on VHF and UHF. Also, this is the lowest frequency band available for high-speed digital networking.

Amateur Radio's primary contribution to the public comes from Emergency and Public Service communication. UHF repeaters are an important element of that service. Here are some examples.

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We regularly use UHF to relay SKYWARN spotter reports from the Greensboro/Winston-Salem area to the National Weather Service office in Raleigh. Recently, the Newport, NC, NWS office suffered a failure of their Doppler RADAR system. During the outage, a line of severe thunderstorms developed in the Newport coverage area, and a tornado watch was issued. The Raleigh NWS office provided backup RADAR coverage for the Newport office. But, Raleigh's RADAR resolution was limited due to the great distance involved. Amateur Radio operators used UHF to link SKYWARN spotters in the Newport area directly to the Raleigh RADAR operator, more than 100 miles away. This allowed the Raleigh RADAR operator to hear immediate, first-hand verification of the weather the Doppler system was indicating.

When Hurricane Fran swept through North Carolina in 1996, this same UHF Amateur Radio link provided uninterrupted communications between the Wilmington and Raleigh NWS offices during the peak of the storm.

Much of our public service activity is accomplished with low power, handheld equipment. Although the VHF spectrum is full, there are still many areas where handheld coverage is poor. We rely on UHF to provide coverage in those areas, through complete UHF repeater systems, or by crossband mobile links between UHF handhelds and VHF repeaters. The Research Triangle Park area, located between Raleigh and Durham, is a good example of how UHF fills in the VHF gap. The VHF repeaters serving Raleigh and Durham do not provide reliable handheld coverage in this area. But, since its broad streets carry little traffic on weekends, it is a very popular place for walk-a-thons and bike-a-thons sponsored by the March of Dimes, the Multiple Sclerosis Society and many other charitable organizations. Amateur Radio operators provide the communications support for these events, and without UHF, this would be much more difficult.

The LMCC makes some compelling arguments showing a strong commercial need for additional radio spectrum. However, every user of the limited usable radio spectrum makes this claim. All of them find Amateur Radio's seemingly less important spectrum use a tempting target. Suppose that, one day, all the Amateur Radio spectrum were reallocated to commercial use. Would the needs of commercial services be satisfied? Probably not. Commercial users would still clamor for more spectrum, and the private citizen's most significant gateway to the radio spectrum would be gone.

As the parks provide citizens access to open land, Amateur Radio provides access to relatively unrestricted spectrum. Other radio services (CB, Family Radio) provide the public with very limited access to a tiny bit of radio spectrum, but Amateur Radio is the only place that individual citizens can turn to for a broad range of non-commercial, non-broadcast radio applications, including experimentation. The only price of admission to the Amateur Radio spectrum is passing an exam for an Amateur Radio license, something non-technical people can do with a minimum of study.

And, while we strive to make good use of all our resources, a commercial yardstick for efficiency cannot be applied fairly to Amateur Radio. It's a financial problem. Since each Amateur Radio operator buys his or her own equipment, changes in technology that obsolete large categories of equipment pose an incredible burden, and are adopted gradually. And it's an operational problem. Outside of public service and contest operations, Amateur Radio communication is not based on brief, "to-the-point" exchanges of information. People enjoy some leisure in the parks, and in their Amateur Radio communication.

The LMCC appears aware of Amateur Radio's value and record of service. Rather than proposing total elimination of Amateur Radio in the selected spectrum, they propose sharing the band, with Amateur Radio taking a secondary, non-interfering position. They make no suggestion about how this arrangement might work.

Amateur Radio and PMRC shared spectrum is unworkable, and LMCC's offer to share spectrum should not tip the balance of this request in their favor. Amateur Radio is currently secondary to the US Government in the 420-450 MHz band. Here in the southeast, the government's principle use of the spectrum is for RADAR. Amateur signals do not disrupt the RADAR operation at all, and while the RADAR signals do occasionally disrupt Amateur communications, the effect is minor.

In the 440-450 MHz band, most Amateur communication, and most PMRC communication, would use the same mode: narrowband FM. In major metropolitan areas, each PMRC system placed on the air would merely displace an Amateur system. In the 420-430 MHz segment, Amateur Radio is primarily Television, and any PMRC signals appearing in that spectrum would make Amateur TV unusable.

The LMCC suggests the possibility of making some spectrum available to Amateurs in the 1400 MHz area. While we appreciate the thought, it isn't much of a trade. The LMCC points out that their own need for 450 MHz spectrum is based on immediate equipment availability. They say they could use existing equipment at 450 MHz, while hardware at 1400 MHz and above has not been developed to suit their needs.

Meanwhile, Amateurs would be left with useless UHF equipment bought by personal funds. No equipment is available to suit Amateur needs in the 1400 MHz area, either. The large PMRC market is much more likely to spur hardware development for those frequencies than the Amateur market, but not equipment readily usable by Amateurs.

I urge the Commission to deny the LMCC's request to reallocate the Government/Amateur Radio spectrum between 420-450 Mhz.



David Sutton KD4BFH
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DOCKET FILE COPY ORIGINAL

Maynard B. Skidmore
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Spring Valley, CA 91977

18 May 1998

Federal Communications Commission
Secretary of the FCC, Room 222
1919 "M" Street N.W.
Washington, D.C. 20554

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FCC MAIL ROOM

Subj: RM-9267

Dear Secretary,

I am writing to strongly object to the request contained in RM-9267 submitted by the Land Mobile Communications Council. This request would re-allocate the use of the 440MHz band which the Amateur Radio Community now shares with the Military. Under current usage the two communities have co-existed for several years without interference. However, there is no such guarantee if this request is granted.

As an Amateur Radio Operator (licensed as K7OY) I can attest to the fact that the 440MHz band is very popular and widely utilized among amateurs. Not only is this band a favorite for personal use, but it is also a critical band used by ARES (Amateur Radio Emergency Service) during disasters, emergencies and general public service events. This loss of this band by the Amateur Radio Community would severely impact our ability to effectively respond during a time of crisis, not to mention the many public service events which are routinely manned by amateur radio operators. These events include air shows, parades, Special Olympics events and disaster drills such as earthquake, fire and flooding.

I urge you not to grant the use of the 440MHz band to the Land Mobile Communications Council. This would severely impact the Amateur Radio Community to the detriment of the public good.

Thank you for your consideration of this matter.

Sincerely,

Maynard B. Skidmore

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